

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Andrew B. Bloomer, P.C.
To Call Writer Directly:
(312) 862-2482
andrew.bloomer@kirkland.com

300 North LaSalle
Chicago, Illinois 60654

(312) 862-2000

www.kirkland.com

Facsimile:
(312) 862-2200

August 18, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF)

Dear Judge Furman:

Counsel for General Motors LLC ("New GM") and Lead Counsel for Plaintiffs, having met and conferred, hereby submit for the Court's consideration an agreed-upon proposed order regarding discovery of expert witness-related materials. A copy of the proposed order is attached hereto as Exhibit 1. The parties have not yet developed a mutually agreeable schedule for conducting the depositions of plaintiffs' experts.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: MDL Counsel of Record